

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

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RAJENDER K. SALGAM, *et al.*,

**Plaintiffs,**

v.

ADVANCED SOFTWARE SYSTEMS, INC.

**Defendant.**

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) Civil Action No. 1:18-cv-00029  
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**PLAINTIFF KANDASAMY'S MOTION FOR PROTECTIVE ORDER**

Pursuant to Rules 26(C)(1) and 502(d), Plaintiff Munusamy Kandasamy requests a protective order to allow him to respond to Defendant's discovery without waiving the attorney-client privilege and work-product doctrine.

WHEREFORE, Plaintiff, by counsel, respectfully requests the Court issue the proposed protective order.

A memorandum in support and a proposed order are attached.

Respectfully submitted,

/s/ Robert Porter

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*Attorneys for Plaintiff*

**Rule 26(C)(1) CERTIFICATION**

I, the undersigned counsel for Plaintiff, attempted to resolve this matter with Defendant's counsel, but Defendant does not consent to this Motion.

/s/ Robert Porter

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### CERTIFICATE OF SERVICE

I hereby certify that on December 7, 2018, Plaintiff's Motion for Protective Order, was filed electronically with the Clerk of the Court to:

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/s/ Robert Porter

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